Interpretation for recording of Quantity of Pseudoephedrine or Ephedrine purchased:

Board Staff and the Department of Health interprets quantity in the same way that it is interpreted for Schedule V exempt codeine syrups. Language for record keeping under federal regulations is similar to ACT 256 language regarding quantity of sales.

For the purpose of ACT 256 and the recording of sales for Pseudoephedrine and Ephedrine containing products quantity can be recorded as the number of pills or package size of a specific product and the number of packages of that product. For example, the record could look like:

Date of Transaction
Signature (Signature must be legible or name of person must be printed along with the signature)
Address (required by Department of Health but not included in ACT 256)
Quantity of product (name of product, number of packages, size of packages)
Pharmacist or Technician signature (required by Department of Health)

Or
03/25/2005
John Doe (signature), John Doe (Printed if sig. is illegible)
123 Any Road
Sudafed 12hr, 1x12
Jane Small, P.D.

This is consistent with the Narcotic & Poison Register logbooks available through the Arkansas Pharmacists Association.

IMPORTANT INFORMATION FOR INVENTORY RECORDS

Newly Scheduled pseudoephedrine, ephedrine, and phenylpropanolamine containing products must be inventoried on March 24, 2005 as outlined in the DEA Pharmacist's Manual, "When a drug not previously controlled is scheduled, the drug must be inventoried as of the effective date of scheduling."

This is also addressed in the Code of Federal Regulations 21 CFR § 1304.11
Inventory Requirements

(c) **Biennial inventory date**. After the initial inventory is taken, the registrant shall take a new inventory of all stocks of controlled substances on hand at least every two years. The biennial inventory may be taken on any date which is within two years of the previous biennial inventory date.
(d) **Inventory date for newly controlled substances**. On the effective date of a rule by the Administrator pursuant to Secs. 1308.45, 1308.46, or 1308.47 of this chapter adding a substance to any schedule of controlled substances, which substance was, immediately prior to that date, not listed on any such schedule, every registrant required to keep records who possesses that substance shall take an inventory of all stocks of the substance on hand. Thereafter, such substance shall be included in each inventory made by the registrant pursuant to paragraph (c) of this section.